

## Davis Polk

Greg D. Andres  
+1 212 450 4724  
greg.andres@davispolk.com

Davis Polk & Wardwell LLP  
450 Lexington Avenue  
New York, NY 10017  
davispolk.com

February 19, 2025

### **BY ECF & FAX**

The Honorable Alvin K. Hellerstein  
United States District Court  
Southern District of New York  
United States Court House  
500 Pearl Street  
New York, NY 10007

Re: United States v. Charlie Javice and Olivier Amar, 23 Cr. 251 (AKH)

Dear Judge Hellerstein:

J.P. Morgan Chase Bank, N.A. (“JPMC”) respectfully submits this letter motion to redact portions of the February 4, 2025 hearing transcript in this matter. A table of JPMC’s proposed redactions appears below, and a copy of the transcript with the proposed redactions is submitted herewith as Exhibit A.

The redactions are necessary to protect the privacy of JPMC’s employees. “[C]ase law holds that [an employee’s name] may be redacted where an employee is not a party to action in light of the individual’s privacy interests.” *Okla. Firefighters Pension & Ret. Sys. v. Musk*, No. 22-CV-3026, 2024 WL 2305264, at \*2 (S.D.N.Y. May 20, 2024).

### **Proposed Redactions:**

Page and Line Number
26:5
27: 21
28:12
35:21-22
35:22
36:3
36:4
36:6

**DavisPolk**

Hon. Alvin K. Hellerstein

Respectfully submitted,

/s/ Greg D. Andres

Greg D. Andres

Sidney Bashago

Katherine Swan

Michelle Adler

Christian Hines

DAVIS POLK & WARDWELL LLP

450 Lexington Avenue

New York, New York 10017

(212) 450-4000

greg.andres@davispolk.com

sidney.bashago@davispolk.com

katherine.swan@davispolk.com

michelle.adler@davispolk.com

christian.hines@davispolk.com

*Attorneys for Non-Party JPMorgan Chase  
Bank, N.A.*

cc: All counsel of record (via ECF)